

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America

- 01 Marcelino ANTONIO-Cajellá, YOB: 1987, Mexico  
- 02 Eriberta ROSALES-Maldonado YOB: 1974, Mexico  
- 03 Maria VARGAS-Luna YOB: 1993, Mexico

Case No. M-19-2392-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 4, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. § 846 and 841

Offense Description

Any person who attempts or conspires to possess with the intent to distribute approximately 11.16 kilograms of cocaine, a Schedule II controlled substance.

18 U.S.C. § 2

Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

/s/ Janet Dougherty

Complainant's signature

Janet Dougherty, U.S. HSI Special Agent

Printed name and title

Sworn to and executed by reliable electronic means, sworn to and attested telephonically per FED.R.CR.4.1, and probable cause found on:

Date: 10/5/2019 @ 7:50 p.m.

City and state: McAllen, Texas

  
Judge's signature

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

In April of 2019, Department of Homeland Security (DHS), Homeland Security Investigations (HSI), and McAllen Texas Office Special Agents and Task Force Officers received information regarding a vehicle utilized to transport currency and narcotics. HSI McAllen utilized the vehicle to identify a residence located at 529 E. Sandyhills Ave. in McAllen, Texas, herein referred to as "the residence."

On October 4, 2019, McAllen Police Department conducted a traffic stop of the same vehicle mentioned above for a traffic violation. During the traffic stop, the driver of the vehicle was identified as Marcelino ANTONIO-Cajella and the passenger was identified as Maria VARGAS-Luna. ANTONIO-Cajella granted McAllen Police Officers consent to search the vehicle. A McAllen Police canine free air sniff of the vehicle resulted in a positive alert for the presence of narcotics/currency. A further inspection of the vehicle resulted in the discovery of a large amount of U.S. currency located in a box and in a black bag inside of the vehicle.

HSI McAllen Special Agents arrived at the traffic stop. ANTONIO-Cajella was read his Miranda rights and stated he understood his rights and voluntarily waived them orally and in writing. HSI Special Agents received consent from ANTONIO-Cajella to search the residence.

HSI McAllen Special Agents and TFOs conducted an interview of VARGAS-Luna. VARGAS-Luna was read her Miranda rights and stated she understood her rights and voluntarily waived them orally and in writing. VARGAS-Luna stated that on October 4, 2019, she and ANTONIO-Cajella drove to a residence to pick up a large amount of currency. VARGAS-Luna stated she was working for ANTONIO-Cajella by separating U.S. currency by denomination and wrapping them in plastic. VARGAS-Luna stated her and ANTONIO-Cajella's job was to deliver cocaine to residences in the McAllen, Texas area and to subsequently retrieve money as payment for the narcotics from the residences. VARGAS-Luna stated she and ANTONIO-Cajella received approximately 20-25 packages of cocaine a month in the time they worked together. VARGAS-Luna stated they would be paid approximately \$2,000.00 a month for this work. VARGAS-Luna stated they would also receive an additional \$800.00 in expenses and a vehicle to transport the narcotics to different residences.

HSI McAllen Special Agents and TFOs conducted an interview of ANTONIO-Cajella. ANTONIO-Cajella stated he still understood his rights and voluntarily waived them. ANTONIO-Cajella stated his job was to transport narcotics and currency to multiple residences in the McAllen, Texas area. ANTONIO-Cajella stated he received the narcotics found in the attic of the residence on Sunday, September 29, 2019. ANTONIO-Cajella stated the money found in his vehicle was payment for the narcotics he had previously delivered. ANTONIO-Cajella stated he was transporting the money to the residence at 529 E. Sandyhills Ave. before he was pulled over by law enforcement. ANTONIO-Cajella stated that another individual subsequently picks up the money from the residence and takes it to Mexico. ANTONIO-Cajella stated he is paid approximately \$1,500.00 a month for transporting narcotics to, and currency from, multiple residences.

HSI McAllen Special Agents and TFOs conducted an interview of ROSALES-Maldonado. ROSALES-Maldonado was read her Miranda rights and stated she understood her rights and

voluntarily waived them orally and in writing. ROSALES-Maldonado stated she owed a debt to an individual in Mexico. ROSALES-Maldonado stated that VARGAS-Lunas told her she could come work in the residence to help her pay the debt. ROSALES-Maldonado then moved into the residence. She stated she was paid approximately \$400 a week to count money located inside the residence. Bulk currency wrapped in rubber bands and narcotics were found within close proximity of each other within the attic of the residence. Numerous items—consistent with those found in a narcotics/stash house—were found within the residence. These items included a large amount of rubber bands, latex gloves, ledgers, and numerous cell phones.